



Peter T. Shapiro
77 Water Street, Suite 2100
New York, New York 10005
Peter.Shapiro@lewisbrisbois.com
Direct: 212.232.1322

January 21, 2022

VIA ECF

Hon. James L. Cott
United States Magistrate Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: *Calcano v. Timothy Oulton Retail USA Corporation*
Case No. 21-cv-9401-JLC

Dear Judge Cott:

I am counsel for Defendant. I write with the consent of Plaintiff's counsel to advise that the parties have settled this matter in principle and to request that the Court extend the deadline for Defendant to respond to the Complaint and any other deadlines *sine die*. The parties are working on the settlement papers now and hope to be in a position to submit a proposed Consent Decree for approval within the next 30 days. The Consent Decree would address the ADA access issues raised by the Complaint.

Thank you for your attention to this matter.

Respectfully,

Peter T. Shapiro

Peter T. Shapiro of
LEWIS BRISBOIS BISGAARD &
SMITH LLP

cc: Counsel for Plaintiff (via ECF)